

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LG. PHILIPS LCD CO., LTD.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 05-292 (JJF)
)	
TATUNG COMPANY;)	DEMAND FOR JURY TRIAL
TATUNG COMPANY OF AMERICA, INC.;)	
CHUNGHWA PICTURE TUBES, LTD.;)	
AND VIEWSONIC CORPORATION,)	
)	
Defendants.)	

DEFENDANTS' PROPOSED
VOIR DIRE TO JURY PANEL

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Dated: July 5, 2006

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Viewsonic Corporation

VOIR DIRE TO JURY PANEL

Good morning, ladies and gentlemen. I am Judge Farnan, and I will be presiding over the trial for which a jury is about to be drawn in the case captioned *LG Philips LCD Co., Ltd. v. Tatung Company, Tatung Company of America Inc, Chunghwa Picture Tubes, Ltd., and ViewSonic Corporation*. Briefly stated, this case is a patent infringement action brought by the plaintiff LG.Philips LCD against the defendants Chunghwa Picture Tubes, Ltd., Tatung Company, Tatung Company of America Incorporated, and ViewSonic Corporation. For your information, counsel for parties may occasionally refer to plaintiff LG.Philips LCD Company as "LPL," and they may also refer to defendant Chunghwa Picture Tubes, Ltd. as "CPT."

In this case, LPL is asserting claims of patent infringement against Tatung Company, Tatung Company of America, CPT, and ViewSonic with regard to United States Patent No. 5,019,002, which is entitled "Method of Manufacturing Flat Panel Backplanes including Electrostatic Discharge Prevention and Displays Made Thereby." Very generally speaking, the patent relates to a way of preventing electrostatic discharge from occurring, and damaging the product, during the manufacture of a liquid crystal display or "LCD." The defendants deny that they infringe the patent and also assert that the patent is not valid.

The trial is expected to last two weeks, from July 17, 2006 through July 28, 2006, and our trial days will run approximately from 9 a.m. to 4:30 p.m.

In light of this brief summary, I will ask the panel certain questions, the purpose of which is to: (1) enable the Court to determine whether or not any prospective juror should be excused for cause; and (2) enable counsel for the parties to exercise their individual judgment with respect to peremptory challenges, that is, challenges for which no reason need be given by counsel. If any of you answer any question "yes," please stand up and, upon being recognized by the Court, state your juror number. When I have concluded asking all of the questions, we

will call you to the bench individually to speak with you about your affirmative response or responses.

HAVE CLERK ADMINISTER THE OATH TO THE PANEL

1. You have been given a list of companies.

(a) Is any member of the panel personally acquainted with any officer, director, or employee of any of these companies?

(b) Do you or any member of your household now own, or have you or any such member ever owned, any stocks or bonds in any of the companies?

(c) Have you, any family member, or anyone close to you had any dealings with, or relied financially in any way on, any of the companies?

(d) Is any family member or anyone close to you employed at any of the companies?

2. You have been given a list of the attorneys and law firms.

(a) Is any member of the panel related to, or personally acquainted with, any of these attorneys?

(b) Have you ever been represented by any of these attorneys or other associates or members of the listed law firms?

(c) Have you, any family member, or anyone close to you had any dealings with the attorneys or members of the listed law firms?

(d) Is any family member or anyone close to you employed at any of these law firms?

3. You have been given a list of the individuals who might appear as witnesses. Is any member of the panel related to, or personally acquainted with, any of these individuals?

4. Does any member of the panel have any personal knowledge of this case, or have you read or heard it discussed, or have an opinion regarding it?

5. Has any member of the panel ever been a plaintiff or a defendant in a civil lawsuit?

6. Have you ever been a juror? Were you the foreperson? Did the jury reach a verdict? Were any of the cases on which you served an intellectual property case (including patent infringement, copyright infringement, trademark infringement or trade secret misappropriation)? Was your jury experience positive?

7. Has any member of the panel or anyone close to any member of the panel ever applied for or obtained a patent or trademark, been named as an inventor on an issued U.S. Patent, or been the owner or licensee of a U.S. Patent?

8. You have been given a list of subject areas. Have you, a close friend, or a family member ever been employed, trained, or have any experience in these listed areas?

9. Have you, any member of your immediate family, or anyone close to you ever had any dealings with the United States Patent and Trademark Office?

10. Have you, or has anyone close to you, ever worked for a company that designed products that later became patented?

11. Do you have any views about how easy or difficult it is to get a patent?

12. Do you believe the U.S. Patent Office makes mistakes in awarding patents?

13. Does any member of the panel have any special disability or problem that would make it difficult or impossible for you to serve as a member of the jury in this case?

14. Does any member of the panel have any strong feelings either in favor of or against corporations that would effect your role as a juror ?

15. Does any member of the panel know of any other matter which you believe should be called to the Court's attention as having some bearing upon your qualifications or ability to sit as a juror, or which you think may prevent you from rendering a fair and impartial verdict based solely upon the evidence and my instructions as to the law?

16. Do you own your home?

17. Have you ever made a claim for disability, Workers' Compensation or bankruptcy?

18. Do you think that business executives from Korea have lower standards for business ethics than American business executives?

19. Do you think that business executives from Taiwan have lower standards for business ethics than American business executives?

20. Do you believe it is hard for a patent applicant to deceive the U.S Patent Office?

21. Do you follow the news?

22. Do you think it is a good idea that patents protect an inventor from competition for many years to come?

23. Do you believe patents on new inventions only serve to raise consumer prices on the resulting products?

24. Do you frequently discuss political issues?

25. Do you believe that an important function of juries in America is to send messages to corporations to improve their behavior?

COMPANIES

- (a) LG.Philips LCD Co., Ltd.
- (b) LG Electronic, Inc.
- (c) Tatung Company
- (d) Tatung Company of America Incorporated
- (e) Chunghwa Picture Tubes, Ltd.
- (f) ViewSonic Corporation

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WITNESSES

Expert Witnesses

Arthur H. Cobb
Elliott Schlam
Webster E. Howard
Michael J. Wagner

SUBJECT AREAS

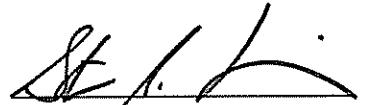
- (a) electrical engineering
- (b) liquid crystal displays
- (c) law of patents
- (d) mechanical engineering
- (e) computer design
- (f) integrated circuit design or manufacturing

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**UNITED STATES DISTRICT COURT
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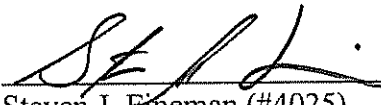
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 5, 2006, I electronically filed the foregoing document with the Clerk of Court using CM/ECF which will send notification of such filing, and hand delivered to the following:

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I hereby certify that on July 5, 2006, I sent the foregoing document by Electronic Mail, to the following non-registered participants:

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